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UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

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In re : Chapter 13  
: Case No. 17-29752 (VFP)  
RICHARD S. AND BETH A. HOLLEY, :  
:   
Debtor. :  
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**CERTIFICATION OF RICHARD S. HOLLEY IN OPPOSITION  
TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY**

Richard S. Holley certifies as follows:

1. I along with my wife, Beth, are the debtor's in the above-referenced case. We filed our petition for relief under Chapter 13 of Title 11 of the United States Code on September 29, 2017 (the "Filing Date").
2. We reside at 27 Mill Lane, Branchville, New Jersey (the "Property").
3. I am an insurance agent at Farmer's Insurance. I own the business. Beth A. Holley is a teacher at Green Hill School in Green Township, New Jersey.
4. The Property is subject to a mortgage lien in favor Visions Federal Credit Union. Our Chapter 13 Plan calls for Visions Federal Credit Union (formally PHH Mortgage) to be unaffected by the plan.
5. We fell behind on mortgage payments because Mr. Holley's income is commission and bonus based. We were not earning enough income at the time we defaulted.

6. We will be curing arrears in full by February 1, 2019.

We hereby certify that the statements contained herein are true and correct to the best of our knowledge, information and belief. If such statements made by us are willfully false, we understand that we are subject to punishment.

Dated: Newton, New Jersey  
January 24, 2019

/s/ Richard S. Holley

RICHARD S. HOLLEY